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Attorneys for Defendant  
SHENZHEN HIGH POWER  
TECHNOLOGY CO. LTD.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ENERGIZER S.A., :  
 :  
Plaintiff, : 07 CV 7406 (LTS)

Against : ECF CASE

M/V YM GREEN her engines, boilers and : **ANSWER TO CROSS-CLAIM**  
Tackle *in rem*; YANG MING MARINE : **OF DEFENDANT KAWASAKI**  
TRANSPORT CORP.; YANGMING (UK) LTD.; : **KISEN KAISHA LTD.**  
ALL OCEANS TRANSPORTATION INC.;  
KAWASAKI KISEN KAISHA LTD.; CONTERM :  
HONG KONG LTD.; VANGUARD LOGISTICS  
SERVICES HONG KONG LTD.; :  
FIEGE GOTH CO., LTD.; and SHENZHEN  
HIGH POWER TECHNOLOGY CO. LTD. :  
Defendants. :

-----X

Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. ("High Power"), by its attorneys Kardaras & Kelleher LLP, as and for its answer to cross-claim of defendant Kawasaki Kisen Kaisha Ltd. ("Kawasaki") contained in defendant Kawasaki's answer to plaintiff's complaint, alleges upon information and belief as follows:

1. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraphs 41 and 42 of the cross-claim of defendant Kawasaki.

2. Answering paragraph 43 of defendant Kawasaki's cross-claim, admits that High Power is an entity existing under the laws of a foreign country and denies that it has knowledge and information sufficient to form a belief as to any of the allegations as to the remaining defendants.

3. Denies each and every allegation of paragraphs 44 and 45 of defendant Kawasaki's cross-claim insofar as it refers to this defendant, and denies knowledge and information sufficient to form a belief as to the remaining defendants.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

4. Defendant High Power claims the benefit of all defenses raised by co-defendants and plaintiff in its response to cross-claims and counterclaims as well as its defenses set forth in its answer to plaintiff's complaint insofar as said defenses may be applicable to defendant High Power.

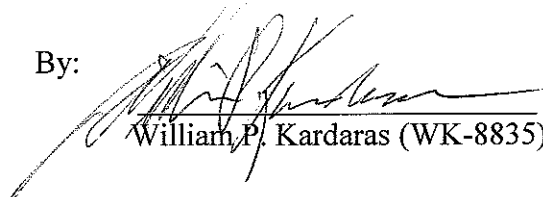
WHEREFORE, Defendant High Power prays that the cross-claim of defendant Kawasaki be dismissed with prejudice, together with costs, disbursements and attorney's fees and for such other and additional relief as to the Court may seem just and proper.

Dated: New York, NY  
February 28, 2008

Respectfully submitted,

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44 Wall Street  
New York, NY 10005  
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SHENZHEN HIGH POWER  
TECHNOLOGY CO. LTD.

By:

  
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**CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL AND BY ECF**

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On February 28, 2008, I served a complete copy of SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.'s Answer to Cross-Claim of Defendant Kawasaki Kisen Kaisha Ltd. by regular U.S. mail and/or by ECF, to the following attorneys at their respective ECF registered address and/or at the following address:

HILL RIVKINS & HAYDEN LLP  
Attorneys for Plaintiff  
45 Broadway, Suite 1500  
New York, NY 10006

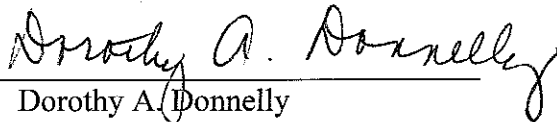
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February 28, 2008

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